September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

PLANT PRODUCTS CORPORATION
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August 17, 1998

new area code 561

Kathy Monk
Chief, Reregistration Branch II
Special Review and Reregistration Division (7508W)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

Subject: Reregistration of Sulfotepp (PC079501); Comments on the Preliminary Risk Assessment

Attn.: Richard P. Dumas

Dear Mr. Dumas:

This letter is in response to the Sulfotepp Preliminary Risk Assessment and your letter of July 20, 1998. In accordance with your letter, we have reviewed the subject document and have identified several errors and apparent omissions of information which we consider significant to the overall risk assessment process. Some of our comments may appear, at least initially, to relate more to matters of interpretation than factual errors. During our evaluation and assessment, however, we considered the following points to relate directly to an accurate and realistic assessment of the real world hazards associated with using our product, Plantfume 103, containing Sulfotepp.

The following comments are offered relative to specific sections of the preliminary risk assessment document and are referenced by page and paragraph number as appropriate. They appear in the order in which they appear in the document itself.

1. Page 5, paragraph IV a. - We do not understand what purpose the recounting of incidents involving the clear misuse of a product serves in the risk assessment process. The first incident involved a violation of label requirements and use restrictions. It is the second incident (Texas greenhouse), however, which concerns us the most. From a factual standpoint, a conclusion was made that the product had been used according to label directions. Plant Products Corporation investigated this incident as much as was possible under the circumstances. The Texas Department of Health was not cooperative in identifying the facility or answering written questions we submitted to EPA relating to the incident. Plant Products Corporation filed a written response to EPA on November 1, 1996 regarding the incident in which we provided our analysis as to why we considered

these exposure incidents to be due to misuse (poor supervision of the applicators and not following the prescribed label procedures for application of the product). There is no mention or indication in the preliminary risk assessment that our response was considered or reviewed in relation to the "factual" conclusions drawn by the Texas Department of health.

2. Page 6 (end of first paragraph) - Regarding the above incident, we note that "a copy of the Texas report and rebuttal prepared by Fuller System, Inc. are attached to this review". The document attachments do not contain the rebuttal prepared by Fuller System, Inc.

3. Page 6, paragraph c. - The document discusses cases involving Sulfotepp submitted to California Pesticide Illness Surveillance Program. In 16 of the cases, sulfotpepp was used alone and judged to be responsible for the health effects (systemic illness) reported. One incident involving three cases reported to involve Sulfotepp leaking to a work site outside a greenhouse. In another Sulfotepp was implicated as leaking from cracks in a greenhouse to a residential area several hundred feet away resulting in eight poisonings. In more than 50 years of selling Plantfume 103, Plant products Corporation has always encouraged its users to report any adverse incidents involving the use of the products. These incidents were never reported to us. We question the inclusion in the document as factual, cases of "poisonings" attributed to the use of Sulfotepp without even the barest of details regarding the symptoms reported, treatments required, and the follow up work necessary to firmly implicate the use of the Sulfotepp itself.

4. Page 7, paragraph B.I.a. - Plant Products Corporation is not aware of any registered use of Sulfotepp (or Plantfume 103) for control of "mollusks, fouling organisms, and miscellaneous invertebrates".

5. Page 29, paragraph II (3rd bullet) states the waiver request for a post application inhalation exposure monitoring study (based on the CDFA study) is not acceptable. While this statement is true, the Agency in a letter dated Feb. 28, 1997 subsequently "granted" Plant Products Corporation a waiver for this date requirement on the basis of the low vapor pressure of Sulfotepp. Plant products Corporation feels this should have been acknowledged in the preliminary risk assessment document.

Plant Products Corporation notes also the lack of any mention of its low volume/minor use waiver request submitted on March 27, 1997 for the remaining two data requirements discussed on Page 29, paragraph II, the dislodgeable foliar residue study and the post application dermal exposure monitoring study. We feel there is important information in this submission to be evaluated before the final decision is made for the remaining exposure date requirements.

2 of 2

Finally Plant Products Corporation recently developed and distributed a questionnaire to our customers designed to answer the questions prosed in paragraph III on pages 29 and 30 of the preliminary risk assessment document as well as other issues relating to actual product use and the potential exposure of greenhouse applicators and post application workers. We anticipate receiving responses to our survey and submitting the results to EPA within the next several months for inclusion and consideration in the final risk assessment and Reregistration process for Sulfotepp.

Sincerely yours,

Mary Ann Chesser
President

MAC/bt